
FORT CAMPBELL ENVIRONMENTAL HANDBOOK
Guidance and Instructions
SATELLITE ACCUMULATION POINT (SAP)

1. **Purpose and Scope:** To provide information necessary to establish an accumulation area for waste materials that meet the definition of hazardous waste and universal waste, and to assist with the necessary documentation to meet regulatory guidelines.

2. **Reference:** 40 CFR 262.34

3. **Definitions:**

a. **Hazardous Waste Accumulation Point:** The Environmental Division's Pollution Prevention Operations Center (PPOC) is the only area on the installation that has been designated as a less than 90-day hazardous waste accumulation point.

b. **Satellite Accumulation Point (SAP):** Is designated at or near the point of generation for the accumulation of hazardous or universal waste. The generator may accumulate no more than 1 quart of an acute toxic hazardous waste or 55 gallons of other hazardous and or universal waste for a period of six (6) months.

c. **Six-Part Folder:** A tool for organizing and managing necessary documents and information to meet the requirements of the SAP procedures and document the lengths of accumulation of wastes. (See attachment A for six-part folder examples).

d. **Hazardous Waste:** Any material that is being discarded and meets the EPA definition of Hazardous waste (i.e. discarded M258/M256 kits, protective mask filters, paints/thinners).

e. **Universal Waste:** Materials that have been discarded and meet the EPA definition of universal waste (i.e. discarded batteries, mercury switches, pesticides and fluorescent bulbs).

f. **Medical hazardous waste:** Materials that are of a chemical nature that are used by medical, dental or veterinary activities that have the Federal Supply Class 6500 series. These materials may be found in the medical section of military units. (Contact the PPOC for proper disposal of these items).

g. **Pharmaceuticals:** Medical materials, other than hazardous waste, which can be turned in to BACH for pick-up by Easy Return, Inc. These items should be turned in at least one week before expiration from facilities in the State of Kentucky, or anytime from facilities located in the State of Tennessee. All expired medical chemicals exceeding five-month's expiration will be turned in to the hospital for disposal. POC is Mrs. Cecilia Bridgeforth at extension 798-8339 E-mail: cecilia.bridgeforth@se.amedd.army.mil

4. **General:** This document provides the general information needed to establish a SAP and the necessary documentation. This Guidance and Instruction DOES NOT apply to materials that are considered to be recycled, such as "Used Antifreeze", "Used Oil" or lead acid batteries and other materials that meet this criteria.

5. **Responsibilities:**

a. **Unit Commander/Activity Director:**

1) Provide command emphasis to the SAP program to reduce the potential for RCRA violations. All RCRA violations start out at \$27,500.00 per violation assessed per day until corrected.

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b. Environmental Quality Officer (EQO):

- 1) Maintain the accountability of the SAP through management of the 6-part folder.
- 2) Advise the Staff Duty officer of the location of the folder in the event of an emergency.
- 3) Conduct training to hazardous waste handlers and used POL handlers twice annually.
- 4) Conduct weekly inspection of the SAP, log the inspection and make appropriate corrections to problems.
- 5) Review the monthly compliance inspection sheets left by the Environmental Division's Compliance Inspection Team to assure all deficiencies are identified and corrected within the time given to meet the compliance requirements.
- 6) Attend the Environmental Division's SAP Manager Operations Course annually for refresher training requirements.
- 7) Conduct training for all personnel handling hazardous and or universal waste within the SAP twice annually or as new personnel assume the duty within 2 weeks with the SAP-Easy Compliance Poster provided by the Environmental Division. All personnel trained must sign the SAP training roster provided by the Environmental Division in Part-1 of the Part-6 folder.

Satellite Accumulation Point Operation Procedures For Easy Compliance	
<p>Hazardous Waste</p> <ol style="list-style-type: none"> 1. Accumulation: no more than 55 gallons of hazardous/ universal waste or only 1 quart of acute toxic waste. 2. Container closed: tightly except when adding or removing waste. 3. Keep container clean 4. Check label: contents are identified and no start dates. 5. Fill date: when container becomes full. 6. Call for pick-up: prepare DD Form 1348-1A if required and fill out the PWBC-Waste Turn-in Log and get stamped for receipt of turn in. 7. File a copy: of the inspection sheets (Internal and External), PWBC-Waste Turn-in Log and all copies of DD Form 1348-1As if required. 	<p>Universal Waste</p> <ol style="list-style-type: none"> 1. Accumulation: no more than 55 gallons of hazardous/ universal waste or only 1 quart of acute toxic waste. 2. Container closed: tightly except when adding or removing waste. 3. Keep container clean 4. Check label: contents are identified and no start dates. 5. Fill date: when container becomes full. 6. Call for pick-up: prepare DD Form 1348-1A if required and fill out the PWBC-Waste Turn-in Log and get stamped for receipt of turn in. 7. File a copy: of the inspection sheets (Internal and External), PWBC-Waste Turn-in Log and all copies of DD Form 1348-1As if required.
<p>Appointed EQO: _____ Phone: _____</p> <p style="font-size: 1.2em; font-weight: bold;">EMERGENCY=911</p> <p>For Pick-up or Pumping Call =798-9790</p>	

c. Environmental Division:

- 1) Provide training and support to assure the unit/activities are properly managing and operating the SAP according to all regulatory requirements.
- 2) Monthly compliance inspections will be conducted at each SAP site to assure all compliance policies are being adhered to.

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- 3) All compliance inspectors will try to contact your unit/activity prior to conducting an inspection. Inspectors may show up to conduct an inspection without prior notification if contact is not made to the appropriate personnel to conduct the inspection.
- 4) All inspectors have a monthly inspection quota that has to be met for division compliance requirements. All inspectors will assure all deficiencies that can be corrected on the spot will be corrected and annotated prior to them leaving the unit/activity.
- 5) Inspectors will leave a copy of the results of the inspection to post in Part 5 of the 6 Part Folder for the unit EQO and or Commander/Supervisor to review during their monthly inspection. (See attachment 5 of the six-part folder example).

6. **Instructions:**

- a. Satellite Accumulation Point will be established at unit/activity level to allow for management of Hazardous and or Universal Waste being generated and accumulated.
- b. When it is determined that hazardous and or universal waste is being generated.
 - A memorandum will be sent to the Environmental Division requesting approval for a SAP to be established.
 - The following information is required: A memorandum signed by the Environmental Quality Officer and Commander requesting the establishment of each SAP within the facility to include the responsible individuals' (primary and alternate) names, grade/rank, work and home phone numbers.
- c. When the SAP is approved, a 6-part folder must be established and maintained as outlined under the Six Part Folder Instructions below.
- d. Additional requirements levied on a SAP are:
 - (1) Waste must be collected at or near the point of generation and under the control of the operator generating the waste.
 - (2) All containers storing hazardous waste must be in good physical condition and **kept closed tightly except when adding or removing waste.**
 - (3) The container must be labeled with a hazardous waste or universal waste label or if a label is not obtainable at the time the waste container is started then, it must be visibly marked with the words:

"HAZARDOUS WASTE" And "Name of what is being accumulated"	"UNIVERSAL WASTE" And "Name of what is being accumulated"
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 - (4) Additional labeling may be required prior to the time of turn-in.
 - (5) The hazardous waste and or universal waste label must have the contents identified on the appropriate block and there will be no accumulation start dates put on these labels. These labels can be obtained at the PPOC. If you have any questions regarding this call the PPOC.
 - (6) Once a container of hazardous waste becomes full.

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- A piece of tape will be placed on top of the container's lid and the date that the container became full will be written on the tape.
- Units and activities can call the PPOC to schedule a hazardous waste or universal waste pick up appointment or a unit drops off appointment if needed.
- After the pick up call has been made then fill out all the appropriate information in the waste turn in log in part 6 of the 6-part folder.
- Some units/activities may be required to complete a DD Form 1348-1A for turn-in of the waste.

See part 6 of the 6-part folder directives below to determine if your unit/activity is required to fill out a DD-Form 1348-1A to turn in waste.

(7) The SAP-Easy Compliance Poster must be posted at or near the SAP location so all personnel working in the SAP can clearly view the poster for a reminder of the proper procedures of operating a SAP. The SAP-Easy Compliance Poster is also a training aide for the EQO when training SAP personnel.

SIX PART FOLDER INSTRUCTIONS

The six-part folder is a method of keeping all documentation together to provide you at your unit/activity with the necessary information for employee health and safety purposes, responding to an emergency situation or turning in products that may have become hazardous waste. The six-part folder is a critical item related to the Satellite Accumulation Point (SAP).

Attached are examples that may be used to assist with the 6-part folder. Feel free to duplicate these forms for your convenience. The six-part folder should be kept in an area that is accessible to the unit staff duty person. They should be briefed on the location of this folder in the event of an emergency. Any facility storing hazardous wastes will establish a six-part folder that will be utilized to record waste generation and turn-in documentation.

Each record will be set up as follows:

PART 1:

- a. Memorandum signed by the Environmental Quality Officer and Commander/Director, requesting the establishment or to re-certify each SAP within the facility.
- b. Letter of approval/re-certification signed by Environmental Division giving approval for establishing the SAP and re-certified annually.
- c. A site-specific contingency plan drawing showing the exact physical location of each SAP, to include the area of hazardous materials or chemicals stored at the facility. For activities, which have a storm water management plan, you can refer to the plan for scale drawings of specific sites. The plan must be updated when **a SAP has been approved to move to a new location**. No SAP can be moved without written permission of the Environmental Division. (See part 1 for example of the site specific drawing requirements)
- e. A copy of the SAP Operations Training Course certificate and updates.
Refresher training must be attended annually even if EQO certified.
- f. SAP training roster must be posted and kept current for all personnel trained by the EQO. Training must be conducted annually or as new personnel assume the duty. All training rosters must be kept on file for 3 years.
(See attachment: For all examples in part-1 of the 6-part folder.)

PART 2:

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a. A complete listing of hazardous materials/chemicals that is stored and/or used at the facility. You may also post the GSL Inventory Sheet(s) provided by the HMCC with the Hazardous Material Inventory Sheet.

PART 3:

a. A copy of each Material Safety Data Sheet (MSDS) for each product that is being used or accumulated.

b. If there are too many MSDS's to file in this part, file a memorandum in lieu of the MSDS stating that the MSDS's are filed in a 3 ring binder and identify their specific location.

PART 4:

a. A waste profile sheet for materials that are generated from an industrial operation (i.e. paint, paint booth clean-up materials) and accumulated in the SAP if needed. The Environmental Division will determine exemptions to this requirement. All waste profiles may be obtained from DRMO (building 5212) by calling Ms. Sandy Sullivan or Elaine McBride at extension 798-3295.

b. Example DD Form 1348-1A for each waste stream being accumulated.

PART 5:

a. Record of weekly inspections performed by the responsible individual or the environmental quality officer (EQO) of each SAP indicating any violations and the corrective actions. Refer to the "Weekly Satellite Storage Inspection Form" (See part 5 of the six-part folder example).

b. Copy of any inspection performed by the PWBC Environmental Division (monthly) or any other external organization (i.e. Multimedia SAP inspection etc.). Any violation found by the Environmental Division's Compliance Inspectors should be corrected on the spot. If violations are found that cannot be corrected immediately, a follow up inspection will be conducted to assure the violations have been corrected. The Environmental Division's SAP Manager will conduct re-inspections on any SAP sites that have re-occurring violators that have not been corrected and violations not found corrected may result in immediate closure of the unit/activity SAP site.

c. All copies of all inspections must be kept on file for 3 years. If a SAP closes down, all files must be given to the Environmental Division to archive the files for compliance requirements.

PART 6:

a. Generate a DD form 1348-1A turn-in document accompanied with the waste turn-in log if your unit/activity is identified below. All copies of all DD form 1348-1A Turn-In Documents must be maintained for 3 years.

The following units/activities are required to generate a DD form 1348-1A accompanied with the hazardous waste turn-in log.

All civilian contracting activities, Blanchfield Army Community Hospital (BACH), RBC-IMO: Paint booth and laundry operations, Fort Campbell Fire Stations, Tennessee Valley Veterinarian, DENTAC, DynCorp-ALMD/ESRA operations.

It may be required to generate a DD form 1348-1A by any unit/activity upon request of the PPOC due to the amount or rarity of the waste stream the unit/activity is turning in.

b. All units/activities are required to fill out the appropriate information prior to turn-in to the PPOC. This log must be kept on file for 3 years.

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(See attachment: sample of the SAP Hazardous Waste Turn-In Log in part-6 of the 6-part folder.)

Note: Information in Parts 1 and 2 will also be maintained at the PWBC Environmental Division. It is the unit's responsibility to ensure that if any changes are required to these records, the appropriate documentation is forwarded to the PWBC Environmental Division. (i.e. moves or closes site, adds or removes waste streams).

SAP DEPLOYMENT INSTRUCTIONS

a. All Units/Organizations deploying off Fort Campbell must submit a 10-day notice in the form of a memorandum to the PWBC Environmental Division (Pollution Prevention) to request that the SAP be put in an inactive status for any deployment exceeding a 2 week period(10 working days) or longer.

Note: Submit this memorandum in conjunction with the requesting of your contingency packet from the HMCC.

b. Unit/Organization will ensure all hazardous waste in the SAP has been turned in to the PPOC. No waste can remain in the inactive SAP during inactive status.

c. Unit/Organization will contact the Environmental Division, once they have returned from deployment, to place the SAP back into active status. No waste can be accumulated until the SAP has been re-activated.

7. Additional Guidance:

a. For additional information related to SAP and or POL contact the Environmental Division SAP Program Inspectors at the following phone numbers 798-9105 or contact Mr. Allen Gilbert 798-9763 or by e-mail at gilberta@campbell.army.mil

b. If you need accumulation containers, SCUs, labels or to schedule waste pick ups or to drop off waste, please contact the PPOC at extension 798-9790.

c. For future reference, place this document behind Tab number 11 in your Fort Campbell Environmental Handbook.